

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

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**DEIRDRE YOUNG,**

**Plaintiff**

**v.**

**Civil Case No. 1:23cv00445-PTG-JFA**

**WASHINGTON GAS LIGHT  
COMPANY & TEMPORARY  
SOLUTIONS**

**Defendants**

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**The Plaintiff Deirdre Young's R.26 Pre-Trial Disclosures.**

The Plaintiff Deirdre Young, by and through her undersigned counsel, pursuant to Federal Rule of Civil Procedure 26(a)(3) and this Court's October 6, 2023, Scheduling Order, make the following pretrial disclosures.

**A. Rule 26(a)(3)(A)(i) Witnesses Plaintiff Young expects to present**

1. Plaintiff Deirdre Young; to be contacted through counsel.
2. Charles Stanton, spouse of the Plaintiff will testify concerning Young's mental state and Young's contemporaneous discussions with her husband concerning the discrimination, harassment and retaliation at the workplace. Staton is to be contacted via the undersigned counsel.
3. Kiyah Young, daughter of the Plaintiff will testify concerning Young's mental state and Young's contemporaneous discussions with her daughter concerning the discrimination, harassment and retaliation at the workplace. Kiyah is to be contacted via the undersigned counsel.
4. Dmitri Young, son of the Plaintiff will testify concerning Young's mental state and Young's contemporaneous discussions with her son concerning the discrimination, harassment and retaliation at the workplace. Dimitri is to be contacted via the undersigned counsel.

5. Tyrita Thomas, former coworker. Thomas will testify that she was harassed and discriminated at the workplace and that she engaged in protected activity by complaining about the discrimination and harassment to Washington Gas; Temporary Solutions, and Wilder Reed, President of the union.
6. Contressa Keitt, former coworker. Keitt has knowledge of Robb's discriminatory practices at the workplace.
7. Lynette Hyde, Washington Gas employee: was the former supervisor of the Plaintiff and will testify that the Plaintiff was a valuable employee.
8. Thomas Robb, Washington Gas employee, the supervisor of the Plaintiff for the 2019-2020 periods. Robb also discriminated and harassed the Plaintiff, and also received complaints of discrimination and harassment from the Plaintiff.
9. Gwendolyn Drain, Temporary Solutions (TS) employee: has knowledge of Plaintiff's protected activities and also told Plaintiff to raise the complaints of harassment and discrimination directly with her harasser, Thomas Robb.
10. Wilder Reed, President of Teamsters Local 96. Reed is the union representative for Washington Gas. Reed will testify that he brought complaints of discrimination on behalf of the Plaintiff or Tyrita Thomas directly to the attention of Washington Gas and/or its HR department. His last known contact information is: Teamster Local 96 5627 Allentown Rd Suite 202. Suitland, MD 20746. 240-619-3151.
11. Marco Smart, employee of the Defendants. Smart will testify that he had an argument with Thomas Robb concerning politics and race at the workplace.
12. All other witnesses identified by the Defendants, including all employees employed by the Defendants.

Young reserves the right to supplement this list based on any information that might come to light subsequent to the filing of this list. In addition, the Plaintiff Young reserves the right to call witnesses solely for the purpose of impeachment. Finally, Young reserves the right to call any witness listed on Defendants witness list.

**B. Exhibits Young expects to use. Rule 26(a)(3)(A)(iii)**

1. All documents produced by Young in discovery.
2. All documents produced by the Defendant Washington Gas and Temporary

Solutions in discovery.

3. All deposition transcripts.
4. Pleadings in this case; all discovery in this matter, including the Plaintiff and Defendants R.33 and R.34 responses to each other.

<b>Exhibit No</b>	<b>Bates No</b>	<b>Description of Document</b>	<b>Date</b>	<b>Admitted (Y/N)</b>
<b>1</b>	TS_000001 <sup>1</sup>	Dunn email to Temporary Solutions (TS) saying that Robb has spoken to staff about return to work	5/6/2020	
<b>2</b>	TS_05-6	TS HR states that Young's June 2020 email about Robb has been escalated to HR for review and investigation	6/15/2020	
<b>3</b>	TS_008	TS interview notice for Young	6/19/2020	
<b>4</b>	TS_10-11	WA Gas and TS Placement Agreement		
<b>5</b>	TS_23	Email from Young to TS about discrimination at the workplace from Robb. Young also states that she is shocked to learn that she is not returning	6/12/2020	
<b>6</b>	TS_24	Dunn states that Young has been doing a commendable job	4/2/2019	
<b>7</b>	TS_28	Employees who replaced Young and Thomas are in yellow		
<b>8</b>	TS_32-34	Tyrita Thomas' email and letter to HR about Robb's complaints. It also states that Robb will be having a discussion with Dunn about employee returning	6/11/2020	
<b>9</b>	TS_35-38	Young letter to HR about	6/11/2020	

<sup>1</sup> In this filing, we will identify the documents from Temporary Solutions by their last 2-3 digits.

		her concerns with Robb		
<b>10</b>	TS_43-53	TS interview notice to Young.	6/18/2020	
<b>11</b>	TS_55-60	TS EEO interviews with coworkers.	June – Aug 2020	
<b>12</b>	TS_61	Young note to Robb about positive energy at the workplace.	unknown	
<b>13</b>	TS_70-71	Dunn email to TS that they are bringing people on board June 2020. Also states that he and Robb want to interview candidates	5/21/2020	
<b>14</b>	TS_73-88	WGL & TS Temp Contract		
<b>15</b>	TS_94-102	TS response to US EEOC	9/4/2020	
<b>16</b>	TS_107-128	TS EEO Handbook		
<b>17</b>	TS_129-131	Young W2	2017-2020	
<b>18</b>	TS_132-136	Young TS/WG Payroll Hours	2018-2020	
<b>19</b>	TS_199	Young email to Drain that she wants to raise complaints about workplace.	3/16/2020	
<b>20</b>	TS_140	Dunn email to TS that operations are suspended	3/18/2020	
<b>21</b>	TS_202-204	Hourly Sheets	Jan – March 2020	
<b>22</b>	WGL_000001-2 <sup>2</sup>	Robb Statement to US EEOC. Denies making HWE comments. But his reprimand letter says that he did engage in HWE.	9/4/2020	
<b>23</b>	WGL_3-6	Offer letter to Thoams Robb & resume. He went to Fresno Pacific University	10/8/2019	
<b>24</b>	WGL_9-22	Robb 2020 evaluation.	2020	
<b>25</b>	WGL_23-34	Robb 2021 Evaluation	<b>2021</b>	

<sup>2</sup> In this filing, we will refer to the documents submitted by Washington Gas Light (WGL) by their last 2-3 digits.

<b>26</b>	WGL_35	Robb Resignation letter	<b>3/15/2022</b>	
<b>27</b>	WGL_39-54	WG-TS Contract		
<b>28</b>	WGL_61-62	Dunn EEOC Affidavit.	9/4/2020	
<b>29</b>	WGL_57-60	EEO Policy	April 2020	
<b>30</b>	WGL_63-136	WG 2022 Financial Report		
<b>31</b>	WGL_137-140	Young HWE Report to WGL	<b>6/11/2020</b>	
<b>32</b>	WGL_141-143	Proctoring Job Description		
<b>33</b>	WGL_148	Dunn email to TS about shutting down operations at WG	3/18/2020	
<b>34</b>	WGL_150	Dunn Email to TS that Young and Thomas not returning	<b>5/22/2020</b>	
<b>35</b>	WGL_152-154	EEO Policy	March 2020	
<b>36</b>	WGL_155	Org Chart		
<b>37</b>	WGL_166	Shows that Robb was terminated and EEO policies signed by Robb		
<b>38</b>	WGL_167-192	Position Statement to US EEOC	<b>9/9/2020</b>	
<b>39</b>	WGL_193	Robb and Dunn to interview candidates	<b>5/21/2020</b>	
<b>40</b>	WGL_222	Robb asks Young if she is getting behind on schedule.	<b>3/5/2020</b>	
<b>41</b>	WGL_226-231	227: WG Internal Summary showed that Robb engaged in “race, age and politics” discussions that WG deemed inappropriate.	<b>2020</b>	
<b>42</b>	WGL_234-235	“No reason” given for Deirdre not returning to work	<b>unknown</b>	
<b>43</b>	WGL_242-243	WGL Disciplinary	10/30/2020	

		Warning to Robb about HWE against Young		
<b>44</b>	Young-004	Email with Young about pay increase	6/28/2018	
<b>45</b>	Young-10 to 13	Robb email to staff about time cards and schedule	1/3/2020	
<b>46</b>	Young-14 to 15	Young emails with Robb about change of duties and instructions	3/6/2020	
<b>47</b>	Young-017 to 019	Young email to Holly Anzano regarding pay raise	March – April 2019	
<b>48</b>	Young-020 to 34	Young job applications	2019-2022	
<b>49</b>	Young-034 to 37	Young applications for unemployment with Virginia	2020-2021	
<b>50</b>	Young-038	DC unemployment application	2023	

The Plaintiff Young may use the following documents at trial in this action if the need arises:

1. Plaintiff's complaint and amended complaints.
2. Defendant's Answer and amended answers to Plaintiff's complaint.
3. The Plaintiff Young reserves the right to supplement and/or amend this list. In addition, Young reserves the right to use documents not listed above for the purpose of impeachment. Young also reserves the right to use any un-numbered, native-format file produced by the parties which is an attachment to any document listed on Defendants exhibit list. Finally, Young reserves the right to use any document listed on Defendants exhibit list and/or amend this list after the ruling on any motion for summary judgment.

**Plaintiff's written stipulation.**

This was submitted to the Court on 2/20/2024 (ECF 42) by the parties.

***Respectfully Submitted,***

/s/Monique A. Miles

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*Counsel for Plaintiff Deirdre Young*

**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed on 2/21/2024 with copies sent to the following counsel for the Defendants:

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